

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence of  
the Grand Jury and FILED in The U.S.  
DISTRICT COURT at Seattle, Washington.

JUNE 11 2009  
BRUCE RIEKIN, Clerk  
By [Signature] Deputy

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

LEON LETROY ANDERSON,  
a/k/a Leon Letroy McCray,  
a/k/a Tajah Malik Anderson,  
a/k/a Letarius Jermaine Anderson,  
a/k/a William Turk,  
a/k/a James Anthony Rembert, Jr.,  
a/k/a Phillip David Walker,  
a/k/a Phillip Waeker,  
a/k/a Codie Michael Charles Hugueley,  
a/k/a Shawn Michael Ketchum,  
a/k/a Michael Ketchum,  
a/k/a Orlando Lorenzo Lasanta,  
a/k/a Jason Lorenzo Ketchum,  
a/k/a Jason Keichum,  
a/k/a John Andrew Keay,  
a/k/a Sean Alexandre Skipwith,  
a/k/a Sean Andre A. Skirwith,  
a/k/a Sean A. Skibwith, and  
a/k/a Brian Devon Harper,

Defendant.

CR 09 5397 BHS

INDICTMENT



09-CR-05397-INDI

The Grand Jury charges that:

COUNTS 1- 4  
(Bank Fraud)

**A. Scheme to Defraud**

Beginning on or about March 27, 2000, and continuing through on or about  
May 29, 2008, within the Western District of Washington, the defendant, LEON

1 ANDERSON, a/k/a Leon Letroy McCray, a/k/a Tajah Malik Anderson, a/k/a Letarius Jermaine  
2 Anderson, a/k/a William Turk, a/k/a James Anthony Rembert Jr., a/k/a Phillip David Walker,  
3 a/k/a Phillip Waeker, a/k/a Codie Michael Charles Hugueley, a/k/a Shawn Michael Ketchum,  
4 a/k/a Michael Ketchum, a/k/a Orlando Lorenzo Lasanta, a/k/a Jason Lorenzo Ketchum, a/k/a  
5 Jason Keichum, a/k/a John Andrew Keay, a/k/a Sean Alexandre Skipwith, a/k/a Sean Andre A.  
6 Skirwith, a/k/a Sean A. Skibwith, and a/k/a Brian Devon Harper, and others, known and  
7 unknown to the Grand Jury, did knowingly execute and attempt to execute a material scheme  
8 and artifice to defraud Bank of America, Key Bank, and Wells Fargo Bank, financial  
9 institutions, the deposits of which were then insured by the Federal Deposit Insurance  
10 Corporation.

11 B. Manner and Means

12 The manner and means used to accomplish the scheme to defraud included the following:

13 2. LEON LETROY ANDERSON and other scheme participants opened personal  
14 checking accounts at Bank of America, Key Bank, and Wells Fargo Bank, and deposited  
15 nominal amounts of cash into them.

16 3. LEON LETROY ANDERSON and other scheme participants fraudulently  
17 inflated some of the checking accounts they opened by depositing worthless checks which were  
18 written on previously closed checking accounts, including checking accounts which initially had  
19 been opened by other scheme participants.

20 4. After Bank of America, Key Bank, and Wells Fargo Bank credited funds to  
21 LEON LETROY ANDERSON's checking accounts and the accounts of other scheme  
22 participants for the worthless checks they fraudulently deposited, but before the drawee banks  
23 returned the checks to Bank of America, Key Bank, and Wells Fargo Bank, as uncollectible,  
24 LEON LETROY ANDERSON and other scheme participants used automated teller machines  
25 ("ATMs") to withdraw funds from the checking accounts and wrote personal checks on the  
26 checking accounts for amounts far exceeding the actual account balances.

27 5. LEON LETROY ANDERSON and other scheme participants created numerous  
28 new identities by legally changing their names. LEON LETROY ANDERSON legally changed

1           4.     LEON LETROY ANDERSON and other scheme participants created  
2 numerous new identities by legally changing their names. LEON LETROY ANDERSON  
3 legally changed his name to, among other names, Tajah Malik Anderson, Letarius  
4 Jermaine Anderson, William Turk, James Anthony Rembert, Jr., Phillip David Walker,  
5 Codie Michael Charles Hugueley, Shawn Michael Ketchum, Orlando Lorenzo Lasanta,  
6 Jason Lorenzo Ketchum, John Andrew Keay, and Sean Alexandre Skipwith. LEON  
7 LETROY ANDERSON and other scheme participants also created additional similar, but  
8 different, identities by altering the aforementioned names, as well as the license numbers,  
9 on Washington State Driver's Licenses that they legally obtained.

10           5.     In order to avoid detection and to continue operating the scheme, LEON  
11 LETROY ANDERSON and other scheme participants concealed their true identities from  
12 Bank of America, Key Bank, and Wells Fargo Bank by fraudulently using the names to  
13 which they legally changed their names and the names on their altered Washington State  
14 Driver's Licenses to open new checking accounts. LEON LETROY ANDERSON and  
15 other scheme participants further concealed their true identities from Bank of America,  
16 Key Bank, and Wells Fargo Bank by fraudulently using Social Security Numbers which  
17 had not been assigned to them by the Commissioner of Social Security to open new  
18 checking accounts.

19           6.     LEON LETROY ANDERSON passed checks on the accounts that he  
20 fraudulently opened at Bank of America, Key Bank, and Wells Fargo Bank having a total  
21 value in excess of \$95,000.

22     **C.     Execution of Scheme to Defraud**

23           7.     On or about the below-listed dates, within the Western District of  
24 Washington, LEON LETROY ANDERSON knowingly and willfully executed and  
25 attempted to execute the scheme and artifice to defraud, as set forth above, in that LEON  
26 LETROY ANDERSON caused to be conducted the below-listed transactions:  
27  
28

Count	Date	Transaction	Bank and Location of Transaction
1	March 15, 2001	Deposit of the following item into Key Bank account number XXXX8419, opened by LEON LETROY ANDERSON in the name of William Turk: check number 2574, dated March 13, 2001, and made payable to William Turk in the amount of \$1,100.00, written on closed Bank of America account number XXXX9498, which was previously opened by LEON LETROY ANDERSON in the name of Tajah Malik Anderson	Key Bank, Federal Way, Washington
2	December 21, 2003	Deposit of the following item into Wells Fargo Bank account number XXXX2214, opened by LEON LETROY ANDERSON in the name of Jason L. Ketchum: check number 3046, dated December 19, 2003, and made payable to Jason Ketchum in the amount of \$3,200.00, written on closed Columbia State Bank account number XXXX9926, which was previously opened by C.C. in the name of Karl B. Giggy	Wells Fargo Bank, Lakewood, Washington
3	April 2, 2004	Deposit of the following item into Bank of America account number XXXX7566, opened by LEON LETROY ANDERSON in the name of Sean A. Skipwith: check number 2648, dated March 29, 2004, and made payable to Sean A. Skipwith in the amount of \$3,240.00, written on closed Wells Fargo Bank account number XXXX7876, which was previously opened by LEON LETROY ANDERSON in the name of John A. Keay	Bank of America, Lakewood, Washington

<u>Count</u>	<u>Date</u>	<u>Transaction</u>	<u>Bank and Location of Transaction</u>
4	May 10, 2006	Deposit of the following item into Bank of America account number XXXX1045, opened by LEON LETROY ANDERSON in the name of Sean A. Andre Skirwith: check number 3094, dated May 9, 2006, and made payable to Sean A. Skirwith for the amount of \$1,300.00, written on closed Columbia State Bank account number XXXX9926, which was previously opened by C.C. in the name of Karl B. Giggy	Bank of America, Lakewood, Washington

All in violation of Title 18, United States Code, Section 1344 and Section 2.

### COUNTS 5 - 6

(Social Security Number Fraud)

On or about the dates listed below, at Tacoma, within the Western District of Washington, LEON LETROY ANDERSON, a/k/a Leon Letroy McCray, a/k/a Tajah Malik Anderson, a/k/a Letarius Jermaine Anderson, a/k/a William Turk, a/k/a James Anthony Rembert Jr., a/k/a Phillip David Walker, a/k/a Phillip Waeker, a/k/a Codie Michael Charles Hugueley, a/k/a Shawn Michael Ketchum, a/k/a Michael Ketchum, a/k/a Orlando Lorenzo Lasanta, a/k/a Jason Lorenzo Ketchum, a/k/a Jason Keichum, a/k/a John Andrew Keay, a/k/a Sean Alexandre Skipwith, a/k/a Sean Andre A. Skirwith, a/k/a Sean A. Skibwith, and a/k/a Brian Devon Harper, with intent to deceive, falsely represented numbers to be the Social Security number assigned to him by the Commissioner of Social Security, when, in fact, such numbers were not the Social Security number assigned by the Commissioner of Social Security to him:

<u>Count</u>	<u>Date</u>	<u>Transaction in which False Social Security Number Used</u>	<u>Bank and Location of Transaction</u>
5	May 8, 2006	Submission of application for checking account number XXXX1045, in the name of Sean A. Andre Skirwith, in which LEON LETROY ANDERSON falsely listed his Social Security Number as XXX-XX-2827	Bank of America, Tacoma, Washington

Count	Date	Transaction in which False Social Security Number Used	Bank and Location of Transaction
5	May 8, 2006	Submission of application for checking account number XXXX1045, in the name of Sean A. Andre Skirwith, in which LEON LETROY ANDERSON falsely listed his Social Security Number as XXX-XX-2827	Bank of America, Tacoma, Washington
6	January 17, 2008	Submission of application for checking account number XXXX0387, in the name of Sean A. Skibwith, in which LEON LETROY ANDERSON falsely listed his Social Security Number as XXX-XX-3965	Wells Fargo Bank, Tacoma, Washington

All in violation of Title 42 United States Code, Section 408(a)(7)(B).

A TRUE BILL:

DATED: *June 11 2009*

*Signature of Foreperson redacted pursuant to the policy of the Judicial Conference of the United States.*

FOREPERSON

*[Signature]*  
JEFFREY C. SULLIVAN  
United States Attorney

*[Signature]*  
CARL BLACKSTONE  
Assistant United States Attorney

*[Signature]*  
ARLEN R. STORM  
Assistant United States Attorney